

ANS Comment: ANS concurs.

TIA Comments (5/1): "This [ATPC] highly effective method for maximizing frequency reuse has been used in Part 21 for some time but precluded from Part 94 use by the current Regulations. The [Alcatel] petition [supporting the use of ATPC] is strongly endorsed on this issue."

ANS Comment: ANS concurs.

TIA Comments (5/2): "Attempting the 2 GHz relocation without a comprehensive plan could severely disrupt the entire point-to-point microwave spectrum, creating operational problems and financial hardships for system operators and reducing the effectiveness of point to point microwave as a viable communications medium."

ANS Comment: ANS concurs.

Utilities Telecommunications Council (UTC)

UTC Comments (1/2): "UTC generally supports the Alcatel petition ..."

ANS Comment: ANS concurs.

UTC Comments (2/2): "The primary thrust of Alcatel's petition, like UTC's, is that the Commission's NPRM to establish a 'spectrum reserve' in the 2 GHz Microwave band does not adequately address the need for suitable replacement spectrum with appropriate technical characteristics to be in place and available for all displaced 2 GHz microwave users. The Alcatel petition, like the UTC petition, requests commencement of a rulemaking proceeding to address the technical and coordination rules which would have to be amended to make additional spectrum available ..."

ANS Comment: ANS concurs.

UTC Comments (3/1): "Thus, UTC believes that full consideration of the Alcatel proposals in the context of a Commission rulemaking based on both UTC's and Alcatel's petition is warranted."

ANS Comment: ANS concurs.

UTC Comments (4/1): "Specifically, UTC is absolutely opposed to any degradation of the existing private microwave interference standards."

ANS Comment: ANS concurs.

UTC Comments (5/1): "... UTC suggests that ... the existing coordination rules for each microwave band remain in place."

ANS Comment: ANS suggests that the existing coordination rules be reviewed by the entire telecommunications community. Private microwave interference needs must be upheld in this process.

UTC Comments (5/2;6/1): "... the impact on the use of analog microwave equipment should be explicitly addressed in any Commission rulemaking regarding the microwave bands above 3 GHz."

ANS Comment: ANS concurs.

UTC Comments (6/2): "... UTC is in general agreement with the proposals contained in Alcatel's petition."

ANS Comment: ANS concurs.

UTC Comments (6/2): "UTC therefore urges the Commission to defer any further action in Docket 92-9 and initiate a separate rulemaking to incorporate the proposals contained in the UTC and Alcatel petitions."

ANS Comment: We strongly support a NPRM process incorporating the proposals of UTC, ANS and the other members of the telecommunications community.

ATTACHMENT 2

Allocations for Domestic-Fixed Satellite Service *

4/6 GHz

3700-4200 GHz (space-to-Earth)	500 MHz
5925-6425 GHz (Earth-to-space)	500 MHz

12/14 GHz

11.7-12.2 GHz (space-to-Earth)	500 MHz
14.0-14.5 GHz (Earth-to-space)	500 MHz

20/30 GHz **

17.3-20.2 GHz (space-to-Earth)	2900 MHz
27.5-30.0 GHz (Earth-to-space)	2500 MHz

Allocations for Direct-Broadcast Satellite **

12.2 - 12.7 GHz (space-to-Earth)	500 MHz
17.3 - 17.8 GHz (Earth-to-space)	500 MHz

As contained in the U.S. Table of Allocations, Part 2 of the FCC Rules and Regulations

Note: additional allocations were made at the 1992 World Administrative Radio Conference providing for HDTV by satellite. These have not yet been incorporated in the U.S. Table of Allocations.

*** as currently contained in the U.S. Table of Allocations**

**** no current use on these bands in the U.S.**

CERTIFICATE OF SERVICE

I, Becky Juricek, a secretary in the law firm of Gardere & Wynne, do hereby certify that the attached Reply Statement was mailed on July 17, 1992, by first class mail, postage prepaid, to the following:

**The Honorable Alfred C. Sikes
Chairman, Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554**

**The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554**

**The Honorable Sherrie P. Marshall
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554**

**The Honorable Andrew C. Barrett
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554**

**The Honorable Ervin S. Duggan
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554**

**Dr. Thomas P. Stanley, Chief
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554**

**Mr. Robert Pepper, Chief
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, D.C. 20554**

**Mr. Ralph Haller, Chief
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554**

**Cheryl A. Tritt, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554**

**Bruce A. Franca, Deputy Chief
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554**

**Terry L. Haines, Esq.
Chief of Staff
Office of the Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554**

**Charla M. Rath
Telecommunications Advisor to Chairman Sikes
Federal Communications Commission
1919 M Street, Room 814
Washington, D.C. 20554**

**Fred Thomas
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554**

**Jeffrey L. Sheldon, Esq.
Utilities Telecommunications Council
1140 Connecticut Avenue, N.W., Suite 1140
Washington, D.C. 20036**

**David R. Siddall, Esq.
Chief
Frequency Allocation Branch, OET
Federal Communications Commission
2025 M Street, Room 7102
Washington, D.C. 20554**

**Norbert Schroeder
Private Sector Coordinator
Radio Frequency Spectrum Management
U.S. Department of Commerce
National Telecommunications and Information
Administration
14th & Pennsylvania Ave., N.W., Room 4090
Washington, D.C. 20230**

**Gary M. Epstein, Esq.
John P. Janka, Esq.
Latham & Watkins
1001 Pennsylvania Ave., N.W.
Suite 1300
Washington, D.C. 20004
Attorneys for Hughes Communications Galaxy, Inc.**

**Charles F. Wright
Vice President - Corporate Development
Centel Corporation
8725 Higgins Road
Chicago, Illinois 60631**

**Alexander P. Humphrey
GE American Communications, Inc.
1331 Pennsylvania Avenue, N.W.
Washington, D.C. 20004**

**Larry A. Blosser, Esq.
Jodi L. Cooper, Esq.
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Attorneys for MCI Telecommunications Corporation**

**Robert W. Healy, Esq.
Smithwick & Belendiuk, P.C.
1990 M Street, N.W., Suite 510
Washington, D.C. 20036
Attorney for Communications Transmission, Inc.**

**James L. Wurtz, Esq.
Pacific Telesis Group
1275 Pennsylvania Avenue, N.W.
4th Floor
Washington, D.C. 20004**

**Margaret deB. Brown, Esq.
Pacific Telesis Group
130 Kearny Street, Room 3659
San Francisco, California 94108**

**Benjamin J. Griffin, Esq.
Robert J. Aamoth, Esq.
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Attorneys for Home Box Office**

**Wayne V. Black, Esq.
Christine M. Gill, Esq.
Frederick J. Day, Esq.
Keller & Heckman
1001 G Street, N.W., Suite 500 West
Washington, D.C. 20001
Attorneys for The American Petroleum Institute**

**Thomas J. Keller, Esq.
Verner, Lilpfer, Bernhard, McPherson
and Hand, Chartered
901 15th Street, N.W., Suite 700
Washington, D.C. 20005
Attorney for Large Public Power Council and Association of American Railroads**

**Jonathan D. Blake, Esq.
Kurt A. Wimmer, Esq.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Post Office Box 7566
Washington, D.C. 20044
Attorneys for American Personal Communications**

**Joan M. Griffin, Esq.
GTE Service Corporation
1850 M Street, N.W.
Washington, D.C. 20036**

**Fred Collins
Chief Executive Officer
Microwave Radio Corporation
20 Alpha Road
Chelmsford, MA 01824**

**Jeffrey Krauss
17 West Jefferson St., Suite 106
Rockville, MD 20850
Consultant to Microwave Radio Corporation**

**Leonard Robert Raish, Esq.
George Petrutsas, Esq.
Barry Lambergman, Esq.
Fletcher, Heald & Hildreth
1225 Connecticut Avenue, N.W., Suite 400
Washington, D.C. 20036
Attorneys for Harris Corporation-Farion Division**

**Sambran Sandoval
President
National Spectrum Managers Association, Inc.
P.O. Box 8378
Denver, Colorado 80201**

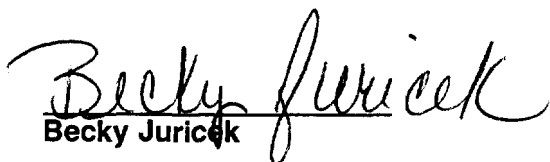
Henry L. Baumann, Esq.
National Association of Broadcasters
1771 N Street, N.W.
Washington, D.C. 20036

J. Laurent Scharff, Esq.
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Attorney for Radio-Television News Directors Association

Bruce Collins, Esq.
Vice President and General Counsel
Cable-Satellite Public Affairs Network
400 North Capitol Street, Suite 650
Washington, D.C. 20001

Julian L. Shepard, Esq.
Vice President and General Counsel
Association For Maximum Service Television, Inc.
1400 16th Street, N.W.
Washington, D.C. 20036

Bertram W. Carp, Esq.
Vice President for Government Affairs
Turner Broadcasting System, Inc.
820 First Street, N.E.
Washington, D.C. 20002


Becky Juricek

116900.03-67269/2